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August 1, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

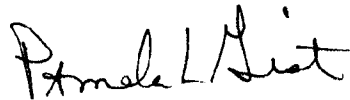
Re: **CC Docket 94-102**
Enhanced 911 Tier III Interim Report
Cellular South Licenses, Inc.

Dear Ms. Dortch:

On behalf of the above-referenced carrier there is transmitted herewith a narrative statement regarding the company's E-911 deployment and implementation status. The filer is a Tier III carrier submitting its Interim Report in accordance with the provisions of the Commission's Order in *Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Order To Stay (rel. July 26, 2002) and the subsequent FCC Public Notice released June 30, 2003, DA 03-2113.

If questions arise with regard to this filing, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Enhanced 911 Tier II Interim Report Cellular South Licenses, Inc.

Cellular South Licenses, Inc. ("Cellular South") is a Tier III CMRS carrier that operates primarily in rural markets in Mississippi, Tennessee, Alabama and Florida. It holds licenses in the cellular radiotelephone services and in the personal communications services. Cellular South's Phase II E911 implementation progress varies by state.

Item I: Number of Phase I and Phase II Requests from PSAPs

Mississippi

Phase I Requests

Cellular South has received valid Phase I requests from 44 PSAPs in Mississippi. Of that number, Phase I has been deployed in 41 PSAPs and is pending in three PSAPs, scheduled to launch within six months of the respective PSAP request. Cellular South has also deployed Phase I in 30 additional PSAPs in Mississippi for which no formal requests were received.

Phase II Requests

Cellular South has received Phase II requests from two PSAPs in Mississippi, one of which, from Jackson County, is clearly valid, and another one from Adams County.

Readiness Issue -- One of the PSAP requests received to date is from Adams County. There is a potential readiness problem with the Adams County PSAP. Cellular South learned that the PSAP, as of early July 2003, had not yet ordered an extended ALI interface, which raised questions regarding their Phase II readiness. The LEC is currently working with the PSAP to educate them on what the PSAP needs to do and deliver them the needed interface. At the current time, Cellular South is in the process of obtaining a written letter from the PSAP acknowledging their lack of Phase II readiness. Cellular South can proceed once the required interface is installed at the PSAP and will be able to deploy Phase II in a timely manner in coordination with the Adams County PSAP.

Funding Limitations -- At the present time, very few states have adopted plans to reimburse wireless carriers for Phase II deployment costs. Mississippi and Alabama, specifically, do not have state legislated cost recovery plans in place for Phase II deployment costs. Such funding limitations leave smaller wireless carriers such as Cellular South obligated to spend millions to implement Phase II, which is a very cost burdensome task.

Tennessee

Phase I Requests

Cellular South has received valid Phase I requests from six PSAPs in Tennessee. Phase I has been deployed in all six PSAPs.

Phase II Requests

Cellular South has received valid Phase II requests from thirteen PSAPs in Tennessee.

Florida

Phase I Requests

Cellular South has received valid Phase I requests from three PSAPs in Florida. Of that number, Phase I has been deployed in two PSAPs and is pending in one PSAP, scheduled to launch within six months of the respective PSAP request.

Cellular South has received valid Phase II requests from two PSAPs in Florida.

Alabama

Phase I Requests

Cellular South has received valid Phase I requests from three PSAPs in Alabama. Of that number, Phase I has been deployed in two PSAPs. and is pending in one PSAP, scheduled to launch within six months of the respective PSAP request.

Phase II Requests

Cellular South has received valid Phase II requests from one PSAP in Alabama.

Item II: Carrier's Specific Technology Choice

In its statement dated November 9, 2000, an election was filed to proceed with a plan for a network based E911 Phase II solution. On December 6, 2002, Cellular South filed an amended Implementation Report explaining that it considered a handset-based solution to be more practical, and accordingly changed its declaration to handset-based. Implementation is underway, and no problems have been encountered to date.

Item III: Status of Ordering and/or Installation of Necessary Network Equipment

Cellular South has a contractual agreement with Intrado to provide the MPC and PDE services in all of our markets. All trunks and data links required have been ordered. All ERSK ranges have been ordered or acquired.

Cellular South utilizes several switches, including the following:

- A Nortel DMS MTX provisioned with software load MTX 10 which is E911 Phase I & II compliant.
- A Lucent Autoplex 1000 with software load ECP 19, which is E911 Phase I & II compliant.
- A Nortel switch located in Mobile, AL is currently undergoing an upgrade to MTX 10, adding Phase II compliant functionality, and will be functional on or about August 9, 2003.

The company provides analog and TDMA services, and is in the process of constructing a CDMA overlay in all of its markets with an anticipated 1st quarter 2004 completion date.

Item IV: Automatic Location Identity ("ALI")-Capable Handset Availability

Cellular South is currently selling E911 Phase II compliant handsets in all of its markets where the CDMA technology is operational. At the current time, the carrier is experiencing no problems obtaining ALI-capable handsets, nor any pricing problems with the handset cost. Furthermore, the carrier is not currently experiencing any problems in marketing ALI-capable handsets to customers, and the carrier does not anticipate any significant problems in the future.

Item V: Estimated Date on Which Phase II Service Will First Be Available

Tennessee

Cellular South anticipates beginning its Phase II service in Tennessee beginning September 1, 2003.

Mississippi

In Mississippi, Cellular South anticipates beginning its Phase II service in six of the seven PSAPs for which it has received valid Phase II requests by October 9, 2003, which is within the six-month time period from receipt of the request(s). In Adams County, deployment is scheduled by November 11, 2003, in accordance with the six-month deployment requirement, unless Adams County requires more time.

Florida and Alabama

Cellular South is in the early stages of constructing a CDMA overlay in its Alabama and Florida markets, which will be Phase II compliant at launch. A TDMA network is currently in place there today. However, due to network decisions by several large CMRS carriers, TDMA networks have become technologically obsolete and there is no ongoing product development to improve such systems. Cellular South does not believe it will benefit the subscribers or Cellular South if there is additional investment in a TDMA network when a better option, such as CDMA technology, is available.

The Alabama/Florida CDMA technology implementation is still in the very early stages, with an anticipated first quarter 2004 completion date. For that reason, Cellular South has postponed significant investment to date to support Phase II on the existing TDMA network in view of the fact that it will be replaced with CDMA technology in the near future. Cellular South believes that it would not be good for the taxpayers in these markets or the CMRS Boards to pay for reimbursement of Phase II deployment via a TDMA network based solution for only a few months' use.

Cellular South is in direct discussions with PSAP personnel in Alabama and Florida regarding the timeline for implementation of CDMA-based E911 Phase II services. The parties are working cooperatively to agree to an implementation date that will accommodate the timing of the CDMA overlay and delivery of Phase II services. Florida PSAP officials, in fact, have expressly consented to Cellular South's proposal to implement Phase II services by February 29, 2004. Cellular South is optimistic that the Alabama PSAPs will likewise find it advantageous to begin receiving Phase II services from Cellular South's CDMA system upon completion of the new network.

Item VI: Information on Whether the Carrier Is on Schedule to Meet the Ultimate Implementation Date of December 31, 2005

At this time, the most significant problem of meeting the requirement of FCC for December 31, 2005 is how to get all existing customers to change out their sets for the required CDMA ALI capable set. Cellular South has a low rate of churn with some of the original system customers still using the large bag phones and high power analog phones. In addition, customers using existing TDMA technology phones will have to be persuaded to change out their customer owned sets to the new technology.

AFFIDAVIT

County of Hinds

State of MS

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SS:

I, Tony Kent, having been first duly sworn, depose and state as follows:

1. I am VP Engineering & network operations for Cellular South
2. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

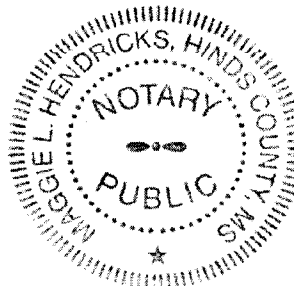
Tony Kent

Subscribed to and sworn to before me
this 31st day of July, 2003.

Maggie L Hendricks
Notary Public

My commission expires:

My Commission Expires July 17, 2004



CERTIFICATE OF SERVICE

I, Daniel Ladmirault, an employee in the law offices of Lukas, Nace Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of August, 2003, sent by U.S. Mail, a copy of the foregoing E911 Quarterly Report of Rural Cellular Corporation (for itself and its affiliates) to the following:

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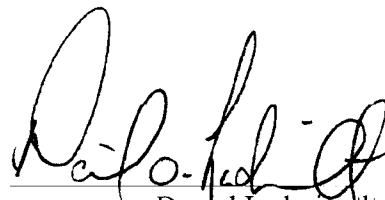
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Daniel Ladmirault

*By Hand-Delivery